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6 Attorney for Tyrell Gill
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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11

12 Plaintiff,

13 v.

14 TYRELL GILL,
15

Defendant.

Case No. 2:23-cr-00213-RFB-MDC

**STIPULATION TO CONTINUE
SENTENCING HEARING**
(First Request)

16
17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
18 United States Attorney, and Robert Knief, Assistant United States Attorney, counsel for the
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Rick Mula,
20 Assistant Federal Public Defender, counsel for Tyrell Gill, that the Sentencing Hearing
21 currently scheduled on June 7, 2024, be vacated and continued to a date and time convenient to
22 the Court, but no sooner than forty-five (45) days.

23 This Stipulation is entered into for the following reasons:

24 1. Counsel for the defendant currently is in a six-week trial (*United States v.*
25 *Dallmann*, Case No. 2:22-cr-00030-RFB-DJA (D. Nev.)) that is expected to proceed until July
26 5, 2024. Consequently, counsel for the defendant is unable to devote significant attention to
other matters during this time frame.

2. Following trial, counsel for the defendant plans to be on leave and out of the district July 11, 2024, through July 15, 2024.

3. The defendant is incarcerated.

4. The parties agree to the continuance.

This is the first request for a continuance of the sentencing hearing.

DATED this 30th day of May, 2024.

RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

By /s/ Rick Mula

By /s/ Robert Knief

RICK MULA
Assistant Federal Public Defender

ROBERT KNIEF
Assistant United States Attorney

1 **UNITED STATES DISTRICT COURT**
2 **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 TYRELL GILL,

7 Defendant.
8

Case No. 2:23-cr-00213-RFB-MDC

ORDER

9
10 IT IS THEREFORE ORDERED that the sentencing hearing currently scheduled for
11 June 7, 2024 at 8:00 a.m., be vacated and continued to July 29, 2024 at 9:15 a.m.
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13 DATED this 31st day of May, 2024.

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16 UNITED STATES DISTRICT JUDGE
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